

Strategic Plan

SP-05 Overview

Strategic Plan Overview

This section contains the Strategic Plan for Housing and Community Development that will guide the City of Allentown's allocation of Community Development Block Grant, Emergency Solutions Grant and HOME Investment Partnerships Program funding during the 2015-2019 planning period. The City's goals for the 2015-2019 period focus on a number of identified priority needs and targeted available resources toward several specific goals that are designed to address those needs. These needs include housing assistance for low income persons, homeless and special needs persons, public improvements and facilities for low and moderate income persons.

These goals primarily focus on helping residents maintain and improve their quality of life in the City. To this end, Allentown will continue to build on successful projects and programs that meet the needs of low and moderate income residents, especially those that are part of the Center City Initiative. Projects selected for funding in the five year period will be managed as efficiently as possible in order to address a wide range of issues that exist in the City.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

Table 1 - Geographic Priority Areas

1	Area Name:	Center City Initiative Program Area
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	
2	Area Name:	Citywide
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	

	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The activities typically undertaken with CDBG, ESG, and HOME funds within the target area designated as the Center City Initiative Area (CCI Area), which is based on income eligibility of residents and areas where the percentage of low and moderate income (IMI) persons is 51% or higher. This area also includes areas of racial and ethnic concentration where the percentage of a specific racial or ethnic group is at least 10 percentage points higher than for the City's overall. Public services are provided at specific locations but are primarily available to residents residing in the Center City Initiative Area. The largest activity, housing rehabilitation, is also provided to residents within the CCI area, depending upon income eligibility.

The City has established a priority area for the FY2015-2019 Planning period. The area is outlined in the Safe and Healthy Neighborhoods: The Center City Initiative report, included in the Grantee Unique Appendices. The "Center City Initiative" is defined by the area generally perceived to comprise Center City Allentown but more significantly by the existing programs and initiatives currently underway. The program area is shown on Map 1 in the report and encompasses the following communities: Jordan Heights; 7th Street Corridor; the Old Allentown and Old Fairgrounds Historic Districts; Hamilton District Main Street area and the Allentown Promise Neighborhood.

The plan was developed upon the realization that downtown and neighborhood revitalization efforts cannot be mutually exclusive. The community as a whole is intent in joining together to help support and ensure a shared success story. The downtown business community recognizes the importance of having strong neighboring communities to attract a stable customer base with discretionary income and an environment that feels safe and is attractive; while the neighborhoods need the strength of the business district as a potential source of employment opportunities, customers for neighborhood businesses and restaurants, and a new market for neighborhood housing.

The combination of actions to address housing, community development and homeless needs, as described in this Consolidated Plan, represent the City's best efforts to meet underserved needs through a coordinated, focused, and ranked program. The system for establishing the priority for the selection of these projects in Allentown are predicated upon the following criteria as well as those included in the Rating Criteria Explanations included in the Citizen Participation amendment:

- Meeting the statutory requirements of the CDBG, ESG and HOME Programs

- Meeting the needs of low and moderate income residents
- Focusing on low and moderate income areas or neighborhoods in the Center City Initiative plan
- Coordination and leveraging of resources
- Response to expressed needs
- Sustainability and/or long-term impact, and
- The ability to demonstrate measurable progress and success.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 2 – Priority Needs Summary

1	Priority Need Name	Affordable Housing: Rental and Homeownership
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents
	Geographic Areas Affected	Citywide Center City Initiative Program Area
	Associated Goals	Housing Rehabilitation Programs for LMI Homeowners Affordable Housing/Owner Occupied Housing Affordable Housing/Rental Planning and Administration
	Description	

	Basis for Relative Priority	<p>Priorities were established from citizen input and a variety of consultations and meetings. The priority list serves as a general guide to decision-making, not a rule. A multitude of factors determine the funding of individual projects, including readiness and the number/concentration of LMI persons served. The priority identification plays an important but not absolute role in project selection. The priorities were established using the following definitions:</p> <ul style="list-style-type: none"> • High priorities are those activities that WILL be funded with CDBG funds • Medium priorities are those activities that MAY be funded with CDBG funds, but only after high priorities have been funded. • Low priorities are those activities that will NOT be funded with CDBG funds by the city; however, the city will consider providing certifications of consistency and supporting applications submitted for non-city funds by other entities. <p>Medium and low priority activities are still important and are not meant to be understood as unnecessary in the city. Rather, it is perceived that those needs may have other, more appropriate funding sources. The City has identified a limited number of priorities to provide a focus for activities that will be funded in the next five year period. If a high priority proposal is not received during the local CDBG application process, a medium priority project may be funded. There are a sufficient number of medium priority needs to ensure that funds can be spent in a timely manner.</p>
2	Priority Need Name	Homelessness
	Priority Level	High
	Population	Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	Citywide
	Associated Goals	Homeless Support Activities

	Description	Homelessness (High priority) <ul style="list-style-type: none"> - Outreach - Emergency/Transitional Housing - Rapid Re-housing - Prevention - Assist homeowner-occupants in financing home repair and improvement projects
	Basis for Relative Priority	<p>Priorities were established from citizen input and a variety of consultations and meetings. The priority list serves as a general guide to decision-making, not a rule. A multitude of factors determine the funding of individual projects, including readiness and the number/concentration of LMI persons served. The priority identification plays an important but not absolute role in project selection. The priorities were established using the following definitions:</p> <ul style="list-style-type: none"> • High priorities are those activities that WILL be funded with CDBG funds • Medium priorities are those activities that MAY be funded with CDBG funds, but only after high priorities have been funded. • Low priorities are those activities that will NOT be funded with CDBG funds by the city; however, the city will consider providing certifications of consistency and supporting applications submitted for non-city funds by other entities. <p>Medium and low priority activities are still important and are not meant to be understood as unnecessary in the city. Rather, it is perceived that those needs may have other, more appropriate funding sources. The City has identified a limited number of priorities to provide a focus for activities that will be funded in the next five year period. If a high priority proposal is not received during the local CDBG application process, a medium priority project may be funded. There are a sufficient number of medium priority needs to ensure that funds can be spent in a timely manner.</p>
3	Priority Need Name	Non Housing Community Development
	Priority Level	High
	Population	Non-housing Community Development
	Geographic Areas Affected	Citywide
	Associated Goals	Public Infrastructure Improvements Public Safety Goals

	Description	- Public Facility - Public Improvements and Infrastructure
	Basis for Relative Priority	<p>Priorities were established from citizen input and a variety of consultations and meetings. The priority list serves as a general guide to decision-making, not a rule. A multitude of factors determine the funding of individual projects, including readiness and the number/concentration of LMI persons served. The priority identification plays an important but not absolute role in project selection. The priorities were established using the following definitions:</p> <ul style="list-style-type: none"> • High priorities are those activities that WILL be funded with CDBG funds • Medium priorities are those activities that MAY be funded with CDBG funds, but only after high priorities have been funded. • Low priorities are those activities that will NOT be funded with CDBG funds by the city; however, the city will consider providing certifications of consistency and supporting applications submitted for non-city funds by other entities. <p>Medium and low priority activities are still important and are not meant to be understood as unnecessary in the city. Rather, it is perceived that those needs may have other, more appropriate funding sources. The City has identified a limited number of priorities to provide a focus for activities that will be funded in the next five year period. If a high priority proposal is not received during the local CDBG application process, a medium priority project may be funded. There are a sufficient number of medium priority needs to ensure that funds can be spent in a timely manner.</p>
4	Priority Need Name	Public Services (Non - Homeless Special Needs)
	Priority Level	High
	Population	Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	Center City Initiative Program Area
	Associated Goals	Special Needs Goals (Non-Homeless) Public Services

	Description	<p>Assistance to:</p> <p>Youth;</p> <p>Persons with alcohol or other drug addiction;</p> <p>Persons with HIV/AIDS and their families; and</p> <p>Victims of domestic violence, dating violence, sexual assault, and stalking.</p>
	Basis for Relative Priority	<p>Priorities were established from citizen input and a variety of consultations and meetings. The priority list serves as a general guide to decision-making, not a rule. A multitude of factors determine the funding of individual projects, including readiness and the number/concentration of LMI persons served. The priority identification plays an important but not absolute role in project selection. The priorities were established using the following definitions:</p> <ul style="list-style-type: none"> • High priorities are those activities that WILL be funded with CDBG funds • Medium priorities are those activities that MAY be funded with CDBG funds, but only after high priorities have been funded. • Low priorities are those activities that will NOT be funded with CDBG funds by the city; however, the city will consider providing certifications of consistency and supporting applications submitted for non-city funds by other entities. <p>Medium and low priority activities are still important and are not meant to be understood as unnecessary in the city. Rather, it is perceived that those needs may have other, more appropriate funding sources. The City has identified a limited number of priorities to provide a focus for activities that will be funded in the next five year period. If a high priority proposal is not received during the local CDBG application process, a medium priority project may be funded. There are a sufficient number of medium priority needs to ensure that funds can be spent in a timely manner.</p>
5	Priority Need Name	Public Housing
	Priority Level	Low
	Population	Public Housing Residents
	Geographic Areas Affected	Citywide
	Associated Goals	Affordable Housing/Rental
	Description	Public Housing Assistance

	Basis for Relative Priority	<p>Priorities were established from citizen input and a variety of consultations and meetings. The priority list serves as a general guide to decision-making, not a rule. A multitude of factors determine the funding of individual projects, including readiness and the number/concentration of LMI persons served. The priority identification plays an important but not absolute role in project selection. The priorities were established using the following definitions:</p> <ul style="list-style-type: none"> • High priorities are those activities that WILL be funded with CDBG funds • Medium priorities are those activities that MAY be funded with CDBG funds, but only after high priorities have been funded. • Low priorities are those activities that will NOT be funded with CDBG funds by the city; however, the city will consider providing certifications of consistency and supporting applications submitted for non-city funds by other entities. <p>Medium and low priority activities are still important and are not meant to be understood as unnecessary in the city. Rather, it is perceived that those needs may have other, more appropriate funding sources. The City has identified a limited number of priorities to provide a focus for activities that will be funded in the next five year period. If a high priority proposal is not received during the local CDBG application process, a medium priority project may be funded. There are a sufficient number of medium priority needs to ensure that funds can be spent in a timely manner.</p>
6	Priority Need Name	Economic Development Opportunities
	Priority Level	High
	Population	Other
	Geographic Areas Affected	Citywide
	Associated Goals	Economic Development/Job Creation
	Description	<p>Develop Economic opportunities for low income residents through targeted and redevelopment that create jobs and provide needed services. Provide assistance to businesses for commercial rehabilitation and security improvements.</p> <p>Job Training</p> <p>Commercial Revitalization</p>

<p>Basis for Relative Priority</p>	<p>Priorities were established from citizen input and a variety of consultations and meetings. The priority list serves as a general guide to decision-making, not a rule. A multitude of factors determine the funding of individual projects, including readiness and the number/concentration of LMI persons served. The priority identification plays an important but not absolute role in project selection. The priorities were established using the following definitions:</p> <ul style="list-style-type: none"> • High priorities are those activities that WILL be funded with CDBG funds • Medium priorities are those activities that MAY be funded with CDBG funds, but only after high priorities have been funded. • Low priorities are those activities that will NOT be funded with CDBG funds by the city; however, the city will consider providing certifications of consistency and supporting applications submitted for non-city funds by other entities. <p>Medium and low priority activities are still important and are not meant to be understood as unnecessary in the city. Rather, it is perceived that those needs may have other, more appropriate funding sources. The City has identified a limited number of priorities to provide a focus for activities that will be funded in the next five year period. If a high priority proposal is not received during the local CDBG application process, a medium priority project may be funded. There are a sufficient number of medium priority needs to ensure that funds can be spent in a timely manner.</p>
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Narrative (Optional)

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	The Allentown Housing Authority owns and operates 1,233 units of public housing at 14 sites and dwelling units and administers 1,453 Section 8 Housing Choice Vouchers throughout the City. As a result, the CDBG, ESG and HOME funds are utilized for projects to improve non public housing units, public facility and public infrastructure projects. No CDBG/HOME/ESG funds are used for TBRA projects.
TBRA for Non-Homeless Special Needs	The Allentown Housing Authority owns and operates 1,233 units of public housing at 14 sites and dwelling units and administers 1,453 Section 8 Housing Choice Vouchers throughout the City. As a result, the CDBG, ESG and HOME funds are utilized for projects to improve non public housing units, public facility and public infrastructure projects. No CDBG/HOME/ESG funds are used for TBRA Non Homeless Special Needs projects.
New Unit Production	<p>Market factors influencing development of new housing units, and particularly affordable housing units include:</p> <p>Cost of land; cost of infrastructure improvements required for development of land; development impact fees; construction requirements; and general economic conditions, including income and employment levels and market interest rates.</p> <p>HOME funds can be used to assist in the development of new affordable housing, targeting different levels of income, up to 80% AMI, and various locations city-wide.</p> <p>Currently, the City has partnered with CHDO's, local non-profit and for-profit agencies to construct and/or rehabilitate affordable housing units with HOME, HOME CHDO and CDBG funds.</p>
Rehabilitation	<p>Market factors influencing the rehabilitation of housing include: age of housing stock; general economic conditions, including income and employment levels as factors which affect whether homeowners repair their homes or not; positive rate of return; presence of lead-based paint, and market interest rates. CDBG and HOME funds can be used to assist.</p> <p>The City's Housing Rehabilitation Program provides financing to enable homeowner-occupants to complete home repairs and lead paint abatement as needed to comply with City code standards. Financing will be available to low/moderate income homeowner-occupants in the form of a loan or grant.</p>

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Acquisition, including preservation	Market conditions influencing acquisition, including preservation, are: age of structure, cost of land, cost of infrastructure improvements required for development of land and positive rate of return.

Table 3 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

The City anticipates receiving approximately \$2,135,396 in 2015 CDBG Entitlement funds, \$665,519 in HOME Entitlement funds, and \$190,484 in ESG funds.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	2,135,396	83,000	367,036	2,585,432	8,541,584	Amount for remainder of Con Plan is estimated as 4 times the Year 1 allocation amount.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	665,519	0	0	665,519	2,662,076	Amount for remainder of Con Plan is estimated as 4 times the Year 1 allocation amount.
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	0	0	0	0	0	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	190,484	0	0	190,484	761,936	Amount for remainder of Con Plan is estimated as 4 times the Year 1 allocation amount.

Table 4 - Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The federal CDBG and HOME funds are intended to provide low and moderate income households with viable communities, including decent housing, a suitable living environment, and expanded economic opportunities. Eligible activities include community facilities and improvements, housing rehabilitation and preservation, affordable housing development activities, public services, economic development, planning, and administration. The City will partner with other public agencies and nonprofit organizations, when feasible, to leverage resources and maximize outcomes in housing and community development. The Allentown Economic Development Corporation and the City of Allentown have utilized a wide range of grants programs to leverage federal funds. The City of Allentown has encouraged private developers and non-profit groups to participate in community revitalization efforts, particularly in the development of affordable housing.

These groups may access such funding sources as the Federal Home Loan Bank or the Low-Income Housing Tax Credit Program to supplement other resources in developing affordable housing for the low income and special needs populations. Allentown will continue to leverage funds

from the Pennsylvania Housing and Finance Agency, Department of Community and Economic Development, and other agencies to address the housing goal.

The Match for the HOME Program will be met through a combination of cash from nonfederal sources and the match for the ESG program will be met through a combination of grants and other fundraising efforts of the ESG subrecipients.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Not applicable

Discussion

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
ALLENTOWN	Government	Economic Development Non-homeless special needs Planning neighborhood improvements public facilities public services	Jurisdiction
REDEVELOPMENT AUTHORITY OF THE CITY OF ALLENTOWN	Redevelopment authority	Ownership Rental	Jurisdiction
ALLENTOWN ECONOMIC DEVELOPMENT CORPORATION	Redevelopment authority	Economic Development	Jurisdiction
ALLENTOWN NEIGHBORHOOD HOUSING SERVICES, INC	Non-profit organizations	Ownership Rental	Region
Allentown Housing Authority	PHA	Public Housing	

Table 5 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The Community Development Dept. is responsible for the overall implementation of the five-year strategy. It administers the contracts with nonprofit organizations providing housing rehabilitation services, homeownership opportunities, shelter and supportive counseling for the homeless, and social services for those threatened with homelessness. The Department works in conjunction with Allentown Housing Authority (AHA), the Bureau of Planning and Zoning, the Bureau of Building Standards and Safety is responsible for code enforcement, systematic inspections, owner occupied rehabilitation and for demolition of dilapidated buildings, the Bureau of Health is responsible for the childhood lead testing program, the Redevelopment Authority of the City of Allentown and the Allentown Economic Development Corporation.

An important part of the institutional structure for affordable housing and community development in Allentown is represented by community-based nonprofit organizations. The city's nonprofit development organizations are "specialized" organizations because they focus on fulfilling a small role in the larger picture of delivering affordable housing in a region with great need. Some of the city's nonprofit organizations limit their efforts to a small geographic area, such as a neighborhood, for maximum impact. The focus tends to be on a particular type of housing (e.g. new units for small families with children) or on meeting a particular need (e.g. rehabilitation of existing units for very LMI households). The City currently works with Alliance for Building Communities, Housing Association and Development Corporation, Habitat for Humanity and Neighborhood Housing Services.

Public housing in Allentown is administered by Allentown Housing Authority (AHA).

The City of Allentown's strengths include: Good Coordination of Programs, Capacity for varied activities, Technical Expertise, and Capacity for varied activities. Their weaknesses include: Limited Resources and Limited Staff.

The Allentown Housing Authority's strengths include: Provides for very low income, disabled, and handicapped residents. Their weaknesses include: Limited Resources

Nonprofits strengths include: Provision of varied Support Services . Their weaknesses include: Limited Resources and technical expertise and Long term financial stability

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X		
Utilities Assistance	X		
Street Outreach Services			
Law Enforcement	X		
Mobile Clinics	X		
Other Street Outreach Services			
Supportive Services			
Alcohol & Drug Abuse	X		
Child Care	X		
Education	X		

Supportive Services			
Employment and Employment Training	X		
Healthcare	X		
HIV/AIDS	X		X
Life Skills	X		
Mental Health Counseling	X		
Transportation	X		
Other			

Table 6 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

There are many social service agencies in Allentown and throughout the LVRHAB region that provide benefits to very low and low income individuals and families in order to prevent homelessness. These organizations also serve the needs of those who have already become homeless. Allentown's government also provides an extensive network and referrals to other government agencies and/or social services when needed. A few of these agencies include the following:

- Allentown Housing Authority;
- Allentown Rescue Mission;
- Community Action Committee of Lehigh Valley;
- Lehigh County Conference of Churches;
- Lehigh Valley Center for Independent Living;
- The Salvation Army; and
- Turning Point of the Lehigh Valley.

These organizations provided many services to homeless or at risk residents, including but not limited to: counseling, case management, life skills training, financial literacy classes, and victim advocacy. These services help residents develop skills and knowledge to transition into permanent supportive housing or independent living and to gain steady employment. The ultimate goal of providing supportive services is self-sufficiency.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

Homelessness and the needs for the Special Needs Population in the City of Allentown is a concern of many of the City's departments including the Department of Community and Economic Development, the Police and Fire Departments, the Department of Parks and Recreation, the Department of Public Works the Bureau of Solid Waste and Recycling, the Health Bureau, the Bureau of Building Standards and Safety, and the Bureau of Planning and Zoning. Each area now has a standard protocol that dictates how a homeless individual or family is assisted. City staff also assists with the annual Point-in-Time surveys, among other activities related to homelessness.

The City of Allentown is supported in its task by the Continuum of Care (CoC) process led by the Eastern PA CofC. The Eastern PA CofC is one of two regional efforts created to encompass non-entitlement portions of the state in order to receive homeless assistance from HUD. Within the region, the Lehigh Valley Regional Homeless Advisory Board encompasses Lehigh and Northampton counties along with the Cities of Allentown, Bethlehem and Easton. The LVRHAB has helped secure \$4 million in competitive grants for the region to provide homeless housing and support services.

However, gaps in the service delivery system exist, including: inadequate funding to provide the level of services needed; and uneven geographic coverage of services. In addition, the following issues have been identified:

- Insufficient public awareness of services and needs
- Various regulations tied to a variety of funding sources, no uniform definition of homelessness for a variety of government programs
- Some language and cultural barriers
- Cultural barriers which may prevent accepting government assistance

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing Rehabilitation Programs for LMI Homeowners	2015	2019	Affordable Housing	Citywide Center City Initiative Program Area	Affordable Housing: Rental and Homeownership	CDBG: \$2,051,480 HOME: \$968,510	Homeowner Housing Rehabilitated: 210 Household Housing Unit
2	Affordable Housing/Owner Occupied Housing	2015	2019	Affordable Housing	Citywide	Affordable Housing: Rental and Homeownership	CDBG: \$1,750,727	Public service activities for Low/Moderate Income Housing Benefit: 800 Households Assisted Homeowner Housing Rehabilitated: 65 Household Housing Unit Housing Code Enforcement/Foreclosed Property Care: 80 Household Housing Unit
3	Affordable Housing/Rental	2015	2019	Affordable Housing	Citywide	Affordable Housing: Rental and Homeownership Public Housing	CDBG: \$550,270 HOME: \$2,026,330	Rental units constructed: 40 Household Housing Unit Rental units rehabilitated: 60 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Homeless Support Activities	2015	2019	Homeless	Citywide	Homelessness	ESG: \$952,420	Tenant-based rental assistance / Rapid Rehousing: 50 Households Assisted Homeless Person Overnight Shelter: 1500 Persons Assisted
5	Economic Development/Job Creation	2015	2019	Economic Development	Citywide	Economic Development Opportunities	CDBG: \$347,180	Public service activities other than Low/Moderate Income Housing Benefit: 485 Persons Assisted Businesses assisted: 15 Businesses Assisted
6	Public Infrastructure Improvements	2015	2019	Non-Housing Community Development	Center City Initiative Program Area	Non Housing Community Development	CDBG: \$1,500,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Public Safety Goals	2015	2019	Public Safety	Citywide	Non Housing Community Development	CDBG: \$2,649,275	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 5000 Persons Assisted Buildings Demolished: 20 Buildings Housing Code Enforcement/Foreclosed Property Care: 85 Household Housing Unit
8	Special Needs Goals (Non-Homeless)	2015	2019	Non-Homeless Special Needs	Citywide	Public Services (Non - Homeless Special Needs)	CDBG: \$100,000	Public service activities other than Low/Moderate Income Housing Benefit: 675 Persons Assisted
9	Public Services	2015	2019	Public Services	Citywide	Public Services (Non - Homeless Special Needs)	CDBG: \$866,455	Public service activities other than Low/Moderate Income Housing Benefit: 3200 Persons Assisted
10	Planning and Administration	2015	2019	Planning and Administration	Citywide	Affordable Housing: Rental and Homeownership	CDBG: \$1,737,500 HOME: \$332,755	Other: 1 Other

Table 7 – Goals Summary

Goal Descriptions

Consolidated Plan

ALLENTOWN

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1	Goal Name	Housing Rehabilitation Programs for LMI Homeowners
	Goal Description	<p>To maintain and improve the condition of the housing stock to meet or exceed current code standards and to reduce overcrowding in housing units as defined in the City's Property Maintenance Code. The five year objectives are:</p> <p>Provide 100 housing rehabilitation loans/grants to LMI homeowners residing within the Center City Initiative Area (CCI);</p> <p>Provide 50 Hazard elimination loans and Lead Paint Removal assistance to LMI homeowners in the City.</p> <p>Provide 20 Lead Remediation loans to LMI homeowners</p> <p>Provide 40 housing rehabilitation loans/grants to LMI homeowners (HOME funding)</p> <p>Total 210</p>
2	Goal Name	Affordable Housing/Owner Occupied Housing
	Goal Description	<p>To make available affordable homeownership, within the existing housing stock (affordability is defined as spending no more than 35% of household income on housing related costs). The five year objectives are:</p> <p>HADC Youthbuild Program Acquisition Project -Acquisition of 20 vacant, substandard properties)</p> <p>Youthbuild Rehabilitation Program-Rehabilitation of 20 properties to be subsequently sold to low income households</p> <p>Lehigh Valley Community Land Trust -Rehabilitation of 10 vacant, blighted properties to be subsequently sold to low and moderate income households.</p> <p>Habitat for Humanity - Rehabilitation of 15 vacant properties to be subsequently sold to low/moderate income families(</p> <p>Community Action Financial Services-A program which includes individual and group counseling which prepares potential homebuyers for the homebuying process- 300500 persons</p> <p>Homeownership Outreach Program - Provides individual counseling to assist persons purchasing a home - 500 persons</p> <p>Property Disposition and Management-LMH - Program delivery costs only for the maintenance and management of 80 vacant buildings</p> <p>945 total</p>

3	Goal Name	Affordable Housing/Rental
	Goal Description	<p>To support the provision of decent, safe, and affordable rental housing with the City and on a regional basis. The five year objectives are:</p> <ul style="list-style-type: none"> • New construction of 40 units; and • Lead remediation of 60 rental units
4	Goal Name	Homeless Support Activities
	Goal Description	<p>To participate in a regional effort to contribute to meeting the shelter and service needs of homeless residents of the City, to assist residents of the City in imminent danger of becoming homeless, and to assist residents in a continuum to find permanent housing.</p> <p>Emergency Solutions Funds will provide funding for Operating Costs to the following non-profits to assist in providing overnight shelter to 1500 persons :</p> <p>Allentown Rescue Mission</p> <p>Salvation Army</p> <p>6th Street Shelter</p> <p>Winter Sheltering Program</p> <p>In addition, Rapid Rehousing funds are provided to rapidly re-house 50 homeless households through Emergency Solutions Grant</p>

5	Goal Name	Economic Development/Job Creation
	Goal Description	<p>Economic Development/Job Creation Goals: The City of Allentown's primary goals for the community are to improve the standard of living and the economic opportunities for City residents, and to revitalize neighborhood commercial and industrial areas, as well as the central business district. In addition, the City will strive to:</p> <ul style="list-style-type: none"> • Increase employment opportunities in the City, with special attention to strengthening the commercial/industrial base; create 15 businesses through micro-enterprise assistance • Facilitate the adaptation and reuse of existing vacant and under-utilized land and • Increase the educational preparedness and level of skills necessary for entrance employment opportunities for residents of the CCI Area; assist 150 people learn literacy skills through the English as a second language program; assist 60 persons with the Next Step to Success Program; assist 150 people with the CCI area job search program • Create a lending program to facilitate economic development projects.

6	Goal Name	Public Infrastructure Improvements
	Goal Description	<p>A primary goal for the City is the improvement of transportation and utility infrastructure, particularly in the CCI Area, to attract new business and industry, and improve the quality of life for residents. Objectives include the following:</p> <ul style="list-style-type: none"> • Pursue infrastructure improvements that will promote commercial/industrial development within the CCI Area; • Pursue infrastructure improvements in residential neighborhoods that improve the overall environment of the Ensure that industrial properties slated for redevelopment/rehabilitation into other uses have the necessary utilities to support these potential uses. • Assist a total of 2,000 residents
7	Goal Name	Public Safety Goals
	Goal Description	<p>The primary goal of the City will continue to be ensuring a safe and secure environment in which residents can live, work, and play, particularly in the CCI Area . Another goal is to reduce the crime and potential for crime, particularly in the. Objectives include the following:</p> <ul style="list-style-type: none"> • Create safe and secure residential neighborhoods and commercial districts; • Enforce existing safety codes for areas in public rights-of-way and In residential neighborhoods <p>Property Disposition and Management - 35 vacant parcels</p> <p>Center city Area Public Improvements - 5,000 residents</p> <p>Demolition of substandard Properties - 20 properties</p> <p>Securing Commercial Porperties - 50 buildings</p>

8	Goal Name	Special Needs Goals (Non-Homeless)
	Goal Description	<p>To participate in a regional effort to make available a full array of permanent housing opportunities for special needs populations</p> <p><u>Priorities for the Elderly/Frail Elderly Population</u></p> <ul style="list-style-type: none"> - Continue to support, locally and on a regional basis, activities that provide affordable housing for elderly and frail elderly residents at or below 80% of area median income. - Priorities for Persons with Mental Illness - Continue to support locally and on a regional basis, local agencies that provide supportive services and outreach programs to individuals with mental illness. - Continue to support, on a regional basis, an increase in the supply of transitional and permanent supportive housing facilities for persons with mental illness and mental disabilities. These facilities should provide case management services to residents. <p><u>Priorities: for Persons with Disabilities</u></p> <ul style="list-style-type: none"> - Continue to support, locally and on a regional basis, local agencies that provide supportive services and outreach programs to individuals and families who have <p><u>Priorities for Persons with Alcohol and Drug Addiction</u></p> <ul style="list-style-type: none"> - Continue to support, locally and on a regional basis agencies that provide outreach programs to individuals with drug and alcohol problems. <p><u>Priorities for Persons with HIV/ AIDS</u></p> <ul style="list-style-type: none"> - Continue to support, locally and on a regional basis, efforts that provide affordable housing to people living with HIV AIDS. - Continue to support organizations that provide supportive services to people living with HIV AIDS <p>Assist a total 675 persons</p>

9	Goal Name	Public Services
	Goal Description	<p>Increase the number of, and access to, recreational and educational program opportunities for residents of the CCI.</p> <p>Examine the recreation/education needs of citizens living in the CCI</p> <ul style="list-style-type: none"> • Work with recreation/education service providers to offer desired services Support the provision of recreational/educational programs within theCCI, whenever possible • Support the provision of convenient transportation to the desired activities when services cannot be provided within the CCI • Encourage recreation/education service providers to recognize other human service needs of participants in the recreation programs, and to make appropriate referrals to other social service agencies <p>Assist 3200 residents</p>
10	Goal Name	Planning and Administration
	Goal Description	Planning and Administration

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

During the 2015 -2019, the City estimates the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing at 150 households.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Public Housing residents and applicants' accessibility needs vary from size to configuration and amenities. The Allentown Housing Authority (AHA) strives to place applicants in suitable units and transfer residents promptly after receiving the proper request and documentation from their physician.

Over the past several years, the AHA has focused on making physical upgrades to all its family and elderly public housing developments through the annual Capital Fund grant (approximately \$1.5 million annually). Ongoing repairs and modernization activities include kitchen and bathroom modernizations, new HVAC and water improvements, new sidewalks, curbs, and roofing. Plans are to request funding for elderly services as well as new housing construction funding from the federal government in the future.

Activities to Increase Resident Involvements

The Gorss Towers and Towers East public housing developments currently have a resident council. The resident councils provide input and are primarily involved in planning for, and feedback on, the renovation/modernization needs of the developments. The resident councils attend regular meetings and take part in the planning processes for both the Five-Year and annual Public Housing Authority (PHA) plans that are submitted to HUD.

The Allentown Housing Authority (AHA) recognizes the inherent difficulty in keeping the resident councils engaged. As such, the AHA plans to seek involvement and support of the councils by scheduling regular meetings with the AHA Executive Director.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the 'troubled' designation

Not applicable

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

A property owner in the City of Allentown will pay real estate taxes to the City, Lehigh County, and the Allentown School District. Each governing body determines its own tax rate; the actual tax paid is based on this rate multiplied by the assessed value of the property. The assessed value of the property is determined by Lehigh County. The most recent assessment was completed in 1990.

Since the City is limited to a one-percent earned income tax under State law, it is heavily dependent upon the real estate tax for revenue. In fact, as the largest source of revenue, the real estate tax provides more than three times the revenue to the City as the earned income tax. The City's tax rate is not excessive compared to other cities of a similar size; however, in comparison to suburban municipalities, Allentown homeowners pay a higher tax rate. This situation wherein the City must disproportionately increase real estate taxes relative to the surrounding municipalities effectively raises costs for purchasing land and developing affordable housing.

In the codified ordinances of the City of Allentown, it states that the purpose of the zoning ordinance "...is the promotion of the public health, safety, morals, and/or general welfare by":

- Encouraging the most appropriate use of land
- Preventing the overcrowding of land
- Conserving the value of land and buildings
- Lessening the congestion of traffic on the roads
- Avoiding undue congestion of population
- Providing for adequate light and air
- Securing safety from fire, flood, and other dangers
- Facilitating adequate provision for transportation, water supply, sewage disposal, draining, school, parks, and other public facilities
- Giving reasonable consideration, among other things, to the character of districts and their peculiar suitability for particular uses
- Giving effect to the policies and proposals of the Comprehensive Plan as approved by the City Planning Commission and adopted by Council

The City is proud of the inclusive nature of its zoning ordinance and does not believe that it impacts negatively upon the ability to develop, maintain, or improve affordable housing.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

As noted above, the City of Allentown has developed policies and procedures that generally support the development of and access to affordable housing.

Regional
Analysis of Impediments
to Fair Housing Choice
Lehigh Valley, Pennsylvania

SP-60 Homelessness Strategy – 91.215(d)

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

During the 2014 Annual Point in Time Count, there were 161 unsheltered persons counted in Lehigh County. The Lehigh Valley has formal outreach teams that work to identify and engage unsheltered persons through outreach and services. Outreach is conducted at soup kitchens and other known locations where street homeless congregate. Additional outreach and other services are provided by the chronic homeless providers throughout the Lehigh Valley. The Lehigh County Conference of Churches' Linkage program provides street outreach to the homeless population in Allentown. Valley Youth House provides a street outreach program for youth in Allentown. Neither of these programs are funded with CDBG or ESG funds, (they did not apply for funding at this time); however the City is supportive of their efforts.

Addressing the emergency and transitional housing needs of homeless persons

In the City as in the CoC, there is a large network of provider agencies that address the shelter and transitional housing needs of persons who are homeless.

The shelters and transitional housing in Allentown:

Community Action Committee of the Lehigh Valley - 6th Street Shelter (ES)

Community Action Committee of Lehigh Valley- Turner St. Apartments (TH)

Salvation Army Emergency Shelter (ES)

Allentown Rescue Mission (ES)

Allentown Rescue Mission Christian Living and Values Transitional Program (TH)

Turning Point of the Lehigh Valley (Domestic Violence) (TH)

The Program for Women and Families, Inc. (TH)

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals

and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

Finding available, affordable units is the challenge most households face in their efforts to move from shelter or transitional to permanent housing. Housing supply is limited and is often priced higher than many households can afford. Affordable units may not be safe or meet minimum housing code standards. The City is working to address the availability and condition of affordable housing and provides a substantial amount of its CDBG and HOME funds to housing.

The LVRHAB encourages shelters and transitional housing providers to access the listing of affordable units on PHFA's housing locator website.

The LVRHAB will start to track the length of time households remain homeless and work to reduce that time. The RHAB hopes to partner with housing authorities to give preference to homeless families. They also plan to address employment and training opportunities to increase income of homeless individuals and households before they leave shelter or transitional housing.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

The LVRHAB is participating with other state CoCs through the PA Homeless Steering Committee to develop partnerships with state agencies that operate programs that discharge individuals to homelessness. Progress has been made with several agencies. Discharge planning by youth serving agencies includes steps to prepare youth for discharge from foster care and penal institutions. Mental health discharge is coordinated with the County Office of Mental Health. The Departments of Corrections and Public Welfare are working to implement a new protocol to ensure that those leaving penal institutions are enrolled in Medical Assistance through the COMPASS application process. This process also will tie into Food Stamps and cash assistance shortly. Discharge from health care is more difficult due to the special needs and short time frame involved in discharge. The PA Homeless Steering Committee is working with the Department of Health, Division of Acute and Ambulatory Care to research and establish protocols.

Coordination of services and local advocacy ensures that families that are already enrolled in one system of care are properly referred to other agencies providing appropriate services. The implementation of some form of coordinated assessment/centralized intake will expand the degree of coordination.

The 2013 CofC Application provides additional narrative on the strategies and goals for helping low income individuals and families avoid becoming homeless. A copy of the application is included in the Grantee Unique Appendices.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

Due to the age of the housing stock, particularly the stock available to low- to moderate- income households, Allentown's Bureau of Health has been active in preventing lead poisoning for children for over 30 years. The Bureau seeks to identify children at risk of lead poisoning, assures medical treatment and case management for the children and their families, and assures that lead hazard reduction activities are conducted in premises where environmental investigations reveal excessive lead levels. Historically, the Health Bureau actively screened children for lead poisoning and provides outreach and presentations at family centers, safety carnivals, health fairs, and child care centers. The Bureau collaborates with area hospitals and family health centers to provide and promote lead screenings. Because of extensive budget cuts, however, the Health Bureau's outreach and testing have been severely reduced in recent years.

There are several possible explanations for the low incidence of childhood lead poisoning in Allentown. One possible reason is the aggressive housing rehabilitation program, conducted by the City's Bureau of Building Standards and Safety, which was historically funded through the CDBG Program. Over 5,000 homes have been inspected during the last 38 years. Also, the housing stock in the City is mostly brick, with few painted, wooden structures.

In addition to identifying children and families who may benefit from the Lead-based Paint Hazard Control program, the Allentown Health Bureau incorporated numerous outreach and education strategies into its activities. Lead poisoning prevention education was offered to families with children under age six including minority and non-English speaking families. Additionally, lead poisoning prevention education was provided to pre-school, child care, and clinics. Moving forward, the Health Bureau is re-evaluating its programs due to severe budget cuts and at this time.

The City will continue to ensure that all housing rehabilitation work is done in accordance with all lead regulations, with housing units certified as lead-safe upon completion.

All contractors working on federally-funded programs must have the appropriate lead certifications and that documentation is kept on file in the City.

How are the actions listed above related to the extent of lead poisoning and hazards?

According to the 2010 Census, the City of Allentown had 46,896 housing units, 85% of which (39,862) were constructed prior to 1980. The Environmental Protection Agency (EPA) has determined that the likelihood of finding lead-based paint increases with the age of the home. That is, a unit constructed prior to 1940 has an 87 percent chance of having a lead hazards; units built between 1940 – 1959 have a 69 percent chance; and units built between 1960 – 1978 have a 24 percent chance of having a lead hazard. Using this formula, 56.7% (26,591) of the City of Allentown's housing units can be estimated to

have lead-based paint present. This is a significant number of homes with potential lead hazards when comparing the state and national percentages of 44% and 30%, respectively.

How are the actions listed above integrated into housing policies and procedures?

In addition to the Allentown Health Bureau's aforementioned outreach and education effort, a key component of the LHC program is the training of contractors in Lead Safe Work Practices. To date, more than 25 workers, representing eight contracting companies, have been trained in same, and additional trainings are expected to be offered in the future.

The program complements continuing activities of both the Bureaus of Health and Building Standards and Safety. The Health Bureau's Childhood Lead Poisoning Prevention Program identifies children who were at risk of lead poisoning, assures that medical treatment and case management were done, and that lead hazard reduction activities were conducted in premises where environmental investigations revealed excessive lead levels. This program began in January 1993; however, the City's Bureau of Health has had an active lead poisoning prevention program for approximately 25 years.

Administrative and code enforcement staff continue to take advantage of training opportunities. Also, staff works to disseminate appropriate information to nonprofit organizations and contractors who will be impacted.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

According to the 2010-2012 American Community Survey, 27% of Allentown residents lived in poverty. The City believes that the most effective method of lowering the number of households living in poverty is to assist them in developing the skills necessary to become more independent and self-sufficient.

Each year, the City budgets a portion of its CDBG funds to the provision of human services, largely to assist extremely low-income individuals and families. For adults, the City funds a literacy program and English as a second language (ESL) classes. For children, CDBG funds are used to support supplemental formal education, life-skills education, cultural enrichment, and structured recreation.

For persons with special needs who have a permanent disability, it may not be practical to expect a reduction in the number of households with incomes below the poverty line, depending on their level of disability. It is possible, however, to offer persons with special needs appropriate options in living environments. Supportive services likely will be an important part of any option chosen. For those who choose to live independently, supportive services will be essential to maintaining their independence. In addition to the services mentioned previously, which are available to all extremely low-income residents, the City funds several services for persons with special needs. For example, it supports a drop-in center for the mentally ill and persons addicted to alcohol or other drugs. The City's housing rehabilitation programs often enable elderly or frail elderly homeowners to remain in their home, and allow those with physical limitations to adapt their home to their specific needs.

The City continues to make efforts in meeting the supportive needs of the homeless, those threatened with homelessness, and those with special needs. In the case of the homeless, the purpose of the supportive services is to assist them in dealing with the problems that led to their homelessness. Hopefully, their stay in a shelter facility will serve as a transition to permanent housing and a starting point towards developing their independence and self-sufficiency. The City will use ESG funds to support the operating budget of emergency shelters and short-term transitional housing programs. This will allow the sheltering organizations to provide more intensive social services to the participants in their programs. In addition, whenever possible, the City will assist the shelter providers in obtaining financial assistance to meet the physical needs of the sheltering facilities.

Previously, it was established that those threatened with homelessness usually are of extremely low income. They are also often in need of a wide range of social services to remove the threat of homelessness and to develop the skills necessary to increase the independence and self-sufficiency.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

Poverty is a function of income. Factors that affect income include education, job training, and employment. The City of Allentown, by itself, has very little control over the factors that cause poverty.

Such factors include unemployment, substance abuse issues, and lack of transportation options to get to and from work, to name a few.

While the City has little control over the overall factors that cause poverty, the City elects to support data-measured organizations that provide quality services to low income residents to help them improve their incomes. For example, the City of Allentown, in partnership with nonprofit organizations and businesses, can influence the chances for poverty-stricken residents of moving out of poverty. The City can achieve this goal by supporting organizations that offer job training and placement services. In addition, the City can help to reduce the number of residents living in poverty by advocating for increased public transit options within the greater Lehigh Valley region to low-income areas, including extended service hours on the evenings and weekends and the addition of new or alternate routes.

Fostering economic growth is also a critical component of reducing poverty. In 2014, the City of Allentown in partnership with a number of local nonprofits and community-focused organizations, studied the center-city area in an effort to identify strategies for its revitalization. Recognizing that downtown and neighborhood revitalization efforts cannot be mutually exclusive, the report issued pursuant to that study indicated that community of Allentown is working together to help support and ensure a shared success story. Additionally, it was noted that the downtown business community understands the importance of having strong neighboring communities to attract a stable customer base with discretionary income and an environment that feels safe and is attractive; while the neighborhoods need the strength of the business district as a potential source of employment opportunities, customers for neighborhood businesses and restaurants, and a new market for neighborhood housing. Taken together, these principles are expected to help reduce the number of poverty-level families living in Allentown.

Ultimately, federal and state policies on welfare, health care, and the minimum wage are crucial factors in the fight to address and reduce poverty. The City will continue to provide incentives for businesses to locate in low income areas, to advocate for improved transportation alternatives, to support organizations that provide job training and placement services, to support homeless prevention activities, and to preserve and improve affordable housing options, as part of its strategy to prevent and alleviate poverty in Allentown.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Most of the activities described previously will be implemented by the City's Department of Community and Economic Development and nonprofit organizations. Each year, the Department of Community and Economic Development prepares an annual plan, based on the City's Consolidated Plan, detailing its anticipated activities during the upcoming program year. Once the plan is approved by the Mayor and City Council, staff are assigned their priorities for the new program year.

Once the new program year has started, supervisors within the Department of Community and Economic Development meet with the staff on a regular basis to monitor their progress towards meeting the objectives outlined in the plan, and to ensure compliance with Federal statutory and regulatory requirements. All expenditures are reviewed by supervisors within the Department of Community and Economic Development. The financial status of the various programs is reviewed on a bi-weekly basis by accounting, administrative, and programmatic staff.

Each year, nonprofit organizations submit applications for funding through City-administered Federal grant programs. The applications are reviewed for eligibility and appropriateness, and the organizations are evaluated for their ability to properly administer the proposed program. Once funding decisions are made, the proposals are used to prepare the contracts with the agencies. Each contract includes a description of the activities to be funded, a schedule for completing the work, the anticipated accomplishments (written as Outcome-Based Objectives) and a budget. The contract also details the applicable Federal regulatory requirements.

Each nonprofit organization must submit monthly progress reports, which enable the City to compare the actual accomplishments to the objectives stated in the contract. Similarly, invoices are compared to the budget contained in the contract. Concerns raised by the progress reports or the invoices are shared with the nonprofit organization. The financial status of the various activities is reviewed by accounting and administrative staff on a bi-weekly basis.

The City conducts on-site monitoring of each subrecipient at least once a year. Additional monitoring may be necessary in some cases. At the end of the program year, the nonprofit organization must submit a cumulative report describing the accomplishments for the entire year. In addition, each agency must submit an annual audit, either a Single Audit or an audit conducted in accordance with generally accepted auditing standards.